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October 10, 2024

**Via ECF**

The Honorable Kenneth M. Karas  
United States District Court for the Southern District of New York  
Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601

**Re: Newman v. Bayer Corporation, No. 7:22-cv-7087-KMK-AEK**  
**Plaintiff's Motion To Seal Documents**

Dear Judge Karas,

I represent Plaintiff Tanysha Newman ("Plaintiff") in the above matter. I write pursuant to Rule IX.A of Your Honor's Individual Rules to request an Order permitting Plaintiff to file under seal the portions of Plaintiff's Reply In Support of Class Certification that relies on or mentions documents that have been previously filed under seal. See ECF Nos. 68, 77.

Were any of these portions to be disclosed, Defendants would be competitively harmed. *Playtex Prods.*, 2016 WL 1276450, at \*11. Accordingly, for the reasons set forth in Plaintiff's Motion to Seal (ECF No. 68), Plaintiff respectfully request that the Court allow these portions to be filed under seal pursuant to Fed. R. Civ. P. 26(c)(1)(G).

Pursuant to Rule IX.A of Your Honor's Individual Practices, I have (i) publicly filed this motion; (ii) publicly filed the aforementioned memorandum with the proposed redactions; and (iii) filed the aforementioned memorandum under seal with the proposed redactions highlighted.

Granted.

Respectfully submitted,

A handwritten signature of Max S. Roberts, which includes the initials 'M.S.' followed by a stylized surname.

10/10/24

A handwritten signature of Max S. Roberts, identical to the one above.

Max S. Roberts

cc: All Counsel of Record (via ECF)